DEQ – Air Quality Division
SUMMARY OF NEGOTIATED RULEMAKING
DAIRY PERMITTING
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PARTICIPANTS

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Beard, Phyllis – Amalgamated Sugar
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Eddie, Bill – Advocates for the West
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Kelly, Kate – Idaho Senate
Kronberg, Lisa – Attorney's General Office
McLean, Lauren – Idaho Conservation League
Naerebout , Bob – Idaho Dairymen's Assoc.
Olmstead, Brent – Milk Producers of Idaho
Parks, Ron – J. R. Simplot
Patten, Marv – ISDA
Sheffield, Ron – University of Idaho
Simon, Mike – DEQ
Heitman, Phyllis – DEQ (Admin Support)

DISCUSSION

Martin Bauer opened the meeting. Ron Sheffield distributed an updated BMP list and definitions dated September 12. Mr. Bauer said the meeting would be devoted to review and clarification of BMPs and definitions, and the control effectiveness points assigned for each. He said he thinks it is important to include language in the definitions explaining the difference in points between the three dairy types. Mr. Bauer said the group must also decide how compliance will be determined and what type of monitoring, recordkeeping or reporting will be required.

Lisa Kronberg stated she recalled the group wanted the table to be part of the rule so there was no question about what the BMPs were and the points assigned. The Department would still have the ability to add items. The definition sheet could be a document separate from the rule. Ms. Kelly asked if revisions to the BMP list or points would be made through the rulemaking process. Mr. Bauer commented it takes a year to complete the rulemaking process. If a new BMP is available, the Department needs the flexibility to add it immediately. Ms. Kelly asked again if the Department would be amending a rule outside of rulemaking. It was suggested that language could be added to the rule stating, "after review by the Department other practices can be added at the Department Director's discretion." Mr. Bauer added the chances a new practice will come on-line are fairly slim. Ms. Kelly asked if appropriate language will be placed in the proposed rule for stakeholders and others to consider. Ms. Kronberg cited language from the draft rule Section 764.01, which states, "As new information becomes available or upon request, the Director may determine a practice not listed in the table constitutes a BMP and assign a point value." Mr. Bauer said the rule would be revised at some point to formally add the new BMP to the table.

Mr. Bauer stated the committee will review the proposed rule language at the next meeting in addition to discussing the total BMP points required to compliant with this rule. He also will update the group about ISDA/DEQ discussions regarding inspections and enforcement.

(Editor's Note: Discussion of proposed rule language may be postponed until a future meeting; review of BMPs will continue at the next meeting.)

He turned the discussion of BMPs to Mr. Sheffield.

LIQUID MANURE STORAGE AND TREATMENT

Synthetic Lagoon Cover.
Definition: Impermeable lagoon cover constructed of flexible polyvinyl chloride or high density polyethylene. Creates an air and water tight seal over the manure surface. Requires a vent to release carbon dioxide and methane.

Points: Open Lot - 15 points; Freestall Scrape – 20 points; Freestall Flush – 20 points
In general, open lot receives fewer points because of the relative amount of manure that would potentially go into the liquid storage structure.

Compliance: Observation.
Dairy either has or does not have; recording and reporting not required. Inspector will have discretion if cover has a tear to decide if the size of the tear is affecting practice, dairy will be required to repair or loose points.

Discussion: Idaho does not currently have any dairies using this practice today.

Geotextile Cover.
Definition: Permeable cover constructed of non-woven synthetic felt. Constructed to provide complete coverage over liquid surface.

Points: Open Lot - 10 points; Freestall Scrape – 13 points; Freestall Flush – 13 points
In general, open lot receives fewer points because the relative amount of liquid storage is less than with the freestall.

Compliance: Observation.
Either has or does not have; recording and reporting not required. Inspector will have discretion if cover has a tear to decide if tear was affecting practice; dairy will be required to repair or loose points.

Discussion: It vents automatically and does not need a special vent.

Solids Separation.
Definition: Gravity or mechanical separation system to remove manure solids from liquid waste stream. Separation pits should be cleaned on a regular basis with holding times less than one month. Separated solids from mechanical systems should be removed from the separator on a regular basis, not to exceed three days.

Points: Open Lot - 3 points; Freestall Scrape – 3 points; Freestall Flush – 3 points

Compliance: Committee undecided – may need deviation log. Additional group discussion is needed.

Discussion: Bob Naerebout asked if there are different types of solid separation and are they all the same when it comes to the release of ammonia? Would some be more effective

than others? Mr. Sheffield said they are all the same and has not seen any data that would suggest otherwise. Marv Patten asked, if this would still apply if you have a solid cap on a gravity flow? Mr. Sheffield responded no, that would be the only change, but then it is flowing into the pond afterward so all the benefits are lost.

Mr. Bauer asked about the reference to a one-month holding time. Ms. Kelly asked how you document how long the material is in the holding area. Phyllis Beard commented that sometimes systems are designed with a series of pits. Each one holds approximately thirty days of material and it is to the operator's advantage to clean it so the pit can go back into the rotation. Mr. Naerebout said cleaning is done as needed, weather permitting. Ms. Kelly asked if there is not sometime in either the gravity or mechanical separation process when the operator can write down that they took an specific action? Mr. Naerebout answered yes, but it will not necessarily encourage or discourage a practice in regard to compliance. The process is not validated by writing it down. He stated there is an adverse economic impact on a dairy for doing separation incorrectly. Ms. Kronberg said that the current stationary source permit process provides for good operation and maintenance of the control devices; perhaps there is a similar dairy industry standard for solid separation that could be included in the rule.

Mr. Naerebout suggested Mr. Sheffield explain in more detail why the industry uses solid separation. Solids tend to plug all types of equipment. If the operator does not solid separate properly he can expect at least a 40% increase in the rate at which the pond fills. To do that in the winter time is a detriment and dairies are well aware of this. Proper separation of manure so liquid can be pumped from the lagoons to a pivot system is the most economical way to handle the material. Improperly separated manure will not pass through the pivots. Also, Mr. Sheffield pointed out the group is talking about a practice with three points. Ms. Kronberg asked if an inspector could immediately tell if the dairy had been using solid separation? Mr. Patten responded, if the system is mechanical, it will be functional. If it is shut down the inspector will be able to observe the material stack and determine freshness. Mr. Patten asked if the group wants to even consider percentage of separation, efficiencies of separation and amount being separated? It is to the benefit of the operation to have a high efficiency rate to keep systems from clogging.

Lauren McLean stated it is a mistake to look at compliance for BMPs on a case-by-case basis. If the group decides BMPs with low points would not require recording, it is possible for a dairy to develop a management plan of low-rated BMPs so they would not have to monitor or record their activities. There would be no documentation for the dairyman or the DEQ to prove compliance. This again goes back to committee members being on different sides when it comes to actually keeping track and proving that dairy operators are following the law.

Ms. Kronberg asked if the group, as part of the definition, could indicate what the inspector would look for during the inspection. Mr. Bauer said that if the inspector can visually prove that the practice if being done then there is no need to record and report. Ms. McLean asked if the inspector goes to the site and finds the dairy is out of compliance with a certain BMP, what documentation would the inspector have? Mr. Patten said if a system is mechanical and not functioning, there will be several other measures the inspector can check to determine if the solid separation practice had been done. If the system is functioning, compliance will be easy to determine. He added that before the inspector writes up a statement of non-compliance, he would certainly investigate far enough to know he is on sound footing.

Mr. Naerebout suggested Mr. Patten review how ISDA inspects dairies for compliance with milk production standards. Assuming ISDA and DEQ agree to ISDA conducting dairy permitting

compliance and enforcement, understanding how ISDA currently performs milk inspections should aid the committee in deciding how ISDA could perform dairy permitting inspections with minimal disruption to the dairies. He recommended Mr. Patten discuss the milk violations ISDA has found in the last 12-18 months on the different sizes of dairies to understand how the system works and how the industry envisions it will work for this new rule. Ms. Kelly asked if dairies, as part of the milk production process, document that they used specific practices? Mr. Naerebout said the only time documentation occurs is when the hauler picks up the milk. He verifies the product is below 45 degrees by looking at the temperature gauge or monitoring clock.

Ms. Kelly acknowledged the milk production program has its own inspection procedures but asked if the dairy industry understands how the air quality permitting program works for industrial facilities. The public has an expectation dairies will be regulated in a manner similar to other industrial sources. Mr. Naerebout said he disagrees it can be regulated in the same manner since there is no way to put a smoke stack and scrubbers on a dairy. The agency is dealing with a totally different type of entity. Ms. Kelly said that what she is talking about is documenting through recordkeeping and reporting that the dairy is complying with management practices it has agreed to without putting the burden on the inspector to show why the facility is non-compliant. If the dairy says they will agree to conduct a specific BMP, it should be willing to jot it down when it is performed to provide a record for the public and the inspector. This is how it is done in air quality permitting program.

Ms. Beard said she agreed, but perhaps the dairy does not need as much recordkeeping as the more traditional plant. She asked if the dairies will have an annual reporting requirement in which they will sign a true, accurate and complete statement? She suggested that rather then checking off every step that is done during the year, the dairy could prepare a deviation log. If the facility is down, the operator could write that instance down - what was done and how long the process was off-line.

Ms. Kronberg reminded the group that it will not be able to anticipate every compliance situation that will arise. This rule will not be perfect the first time – practices and points will need to be revised as BMPs are implemented and inspections done.

Mr. Eddie suggested that to keep the group moving through the definition list, the committee could assign a compliance method for each BMP based on the following categories: (1) Compliance can be "observed" – inspector can see the dairy is in compliance – it is apparent the system is installed and operating and no documentation or record keeping is required; (2) Compliance can only be determined through "recordkeeping"; (3) Compliance determination may need "recordkeeping or documentation," such as a deviation log - committee has not agreed on what is needed. He suggested the group should go through the list and place each BMP into one of these compliance categories. Those in category three can be revisited later.

Composting.
Definition: Stacking and drying of separated manure solids or corral manure. Practice may or may not meet the carbon-to-nitrogen ratio criteria specified in Natural Resources Conservation Service Standard #317. ~~Compost should not be stored longer than 18 months onsite before utilization or export.~~

Points: Open Lot - 4 points; Freestall Scrape – 4 points; Freestall Flush – 4 points

Compliance: Committee undecided – may need deviation log. Additional group discussion is needed.

Discussion: Mr. Sheffield said this has been called "Idaho composting" and he has recently heard it referred to as "moo peat." The length of time does not directly impact the effect of nitrogen. As the pile dries, the lack of moisture keeps the biological process from working and a pile of dirt remains. If moisture is added through rain, the process will recharge but at a decreased efficiency rate. The 18 months is meant to imply this is not a long-term storage of material. This practice is actually solids drying as opposed to true composting where the carbon-to-nitrogen ratio is managed. This practice does not have carbon added. The intent is to drive off water and reduce volume. Members decided the reference to "18 months" was not a significant component and the last sentence should be deleted from the definition.

Ms. Kronberg asked if the inspector will know if a dairy is "solids handling" or composting. Mr. Patten responded, yes, he will know by observing other phases of the operation. A better question is, if the material was moved off-site to a third party, would points be given and how would new receptors be considered.

Ms. Kronberg mentioned that it might be useful in the first year, if ISDA inspectors could document the methods they used to determine compliance with BMPs and if the compliance method described in the BMP definition should be changed. Ms. McLean stated that instead of asking ISDA to document compliance determinations, it might be better to ask one person at each dairy to document operations through a deviation log.

Separate Slurry and Liquid Manure Basins.
Definition: Construction and use of separate holding basins to keep parlor wastewater and corral runoff away from concentrated slurry (manure and urine). Applicable systems would include freestall scrape and open lot dairies, which scrape their feeding alleys.

Points: Open Lot - 6 points; Freestall Scrape – 10 points; Freestall Flush – 0 points
In general, open lot receives fewer points because the relative amount of liquid storage is less than the freestall scrape.

Compliance: Observation.

Discussion: In this practice there will be one pond filled with water and one with solids. This practice is not in use in freestall flush systems. The dairy keeps the collected slurry in a concentrate rather than watering it down to decrease microbial action in the slurry and enable easier handling. In answer to a question from Ms. Kelly about maintenance on the basin, Mr. Sheffield said there is nothing more than on any earthen storage area. Ms. McLean said issues with the basin would be addressed through the Nutrient Management Plan.

Mr. Naerebout asked if there were a practice in place for freestalls wherein the urine is separated from the solids, would this fit into this BMP? Mr. Scheffield said this would be a different BMP called "in-house separation" and is not currently on the list. Points would be in the 12-15 range. Mr. Naerebout continued that this would be doing total separation immediately and inside the operation. This practice should probably be added for those dairies that are expanding and want to do something different; they could probably set that up on open corrals on their feed lines. Mr. Scheffield said this practice has a partially slotted floor where urine in the running solids would go in one direction and all the other materials are vacuumed and

handled separately. Dairies get an efficiency rate of about 65%. If this is a valuable practice and the point values are high enough, this could be a BMP option.

Mr. Bauer said he would start a list of potential BMP's and asked Mr. Sheffield to research and assign point values. This practice will be titled "In-House Separation." Mr. Patten asked that "Summertime Deep Bedding" also be added.

Deep Bedding is a trial that University of California-Davis conducted for VOC emission control in their biological bubbles. It involved placing six to twelve inches of straw on an open corral surface at the start of a three-month trial. They did not add straw during the three months and saw an additional 70% ammonia emissions reduction in summertime conditions. It keeps the solids on top where it can air dry and allows the urine to pass through.

Direct Utilization of Collected Slurry.
Definition: Utilization or direct application of manure slurry instead of placing collected fresh material in storage basin - includes on-farm and export systems.

Points: Open Lot - 6 points; Freestall Scrape – 10 points; Freestall Flush – 0 points

Compliance: Observation when practice is working; may need deviation log in the wintertime when material is not land applied

Mr. Naerebout thinks compliance method should be by "observation" only. Additional group discussion needed.

Discussion: This can go directly to composting. The Treasure Valley systems that are using vacuum compost systems use this practice as the manure handling component. This gets the material out of the freestall barn or feed alleys and utilizing it on-farm or off-farm. The dairy would get credit for the non-storage and utilization of the material. Mr. Eddie observed some practices are double-counted. Mr. Bauer said the points are actually designed this way. For instance in the case of composting, the dairy receives points for making rows and also receives points for using the proper carbon-to-nitrogen ratio. These are two different processes, however, the table makes appropriate adjustments when multiple practices combine to form one higher-rated practice.

An example would be the freestall compost systems located in the Treasure Valley. There is a direct collection and utilization on the farm. Another example would be daily vacuuming and land application off-farm or exporting to a digester. There would be no storage basin or a very small one for maintenance. If the material goes off-farm, there could be a bigger air quality issue. Mr. Bauer stated if the dairy takes the material off-site, it must be certain it is being properly handled and not creating a different problem. Off-farm or third-party manure is a real issue that should be addressed but is not part of this BMP. It was suggested that use of a certified off-farm facility could be an additional BMP with appropriate points.

Mr. Sheffield reminded the group this rule is not airshed ammonia planning, this is facility ammonia management. Mr. Bauer agreed.

A question was asked, if the BMP table is an annual plan and the dairy only uses the practice for half a year, does it receive half of the points? Mr. Bauer stated, if the dairy only uses this practice one-half of the year, you can only receive one-half the points. Mr. Sheffield said in direct utilization, the dairy will be able to use the annual points listed because the dairy is able to

use the practice in other ways during the entire year. Material will not be land applied but it can be composted or sent off-site for digesting. This should be clarified in the definitions.

Ms. McLean posed questions about how partial years would be reported. She asked if dairies could just use a deviation log. Mr. Sheffield said he thinks this practice needs some type of reporting, perhaps a deviation log, because there will be instances when the vacuum trucks are down or a maintenance issue arises.

Direct Utilization of Collected (Parlor) Wastewater.
Definition: Utilization or direct application of parlor wastewater during the active growing season instead of placing collected fresh wastewater in storage basin - includes on-farm and export systems.

Points: Open Lot - 10 points; Freestall Scrape – 10 points; Freestall Flush – 10 points

Compliance: Observation.

Discussion: This is growing season utilization of parlor wastewater. Points are equal for all categories because all three will have the same amount of production coming out of the parlor. The manure should, for all practical purposes, be separated and applied daily during the growing season. On the BMP table, points for seasonal practices are already pro-rated. A statement to this effect should be added to the definition. Pro-rating will need documentation.

There was discussion about the meaning and use of the word "direct"; definitions for "direct utilization of parlor water" and "direct utilization of collected slurry" should be clarified.

The group agreed to add another practice to the new BMP list called "Direct Utilization of Flush Water." Would have to decide where that water comes from. Definition would read "Utilization or direct application of flush water instead of placing collected flush water in storage basin – applicable systems would include freestall flush and open lot flush alley systems." This practice will occur during the active growing season. Points are Open Lot-8, Freestall Scrape-0, Freestall Flush-13. Compliance will be determined by "Observation."

Anaerobic Digester.
Definition: Treatment systems which anaerobically digests organic matter from the manure and converts it into methane using bacteria. The methane is then colleted and may be used to generate electricity or as an alternative to natural gas. A ~~study~~ steady supply of manure is needed - typically no change to nutrient concentration without additional treatment - also effective in reducing volatile organic compounds, biological oxygen demand, and odor.

Points: Open Lot - 0 points; Freestall Scrape – 0 points; Freestall Flush – 0 points
No points assigned because this is not an ammonia control.
Compliance: None

Discussion: Mr. Naerebout stated the Department must ensure the dairies know there is no credit for using this practice for purposes of this rule.

Anaerobic Lagoon.
Definition: Biological earthen basis which manure is designed to decompose liquid manure without the presence of oxygen. This system has a pH of 7.0 to 8.0, and sludge is

designed to be removed every 5 years. Also effective in reducing volatile organic compounds, biological oxygen demand, and odor.

Points: Open Lot - 0 points; Freestall Scrape – 0 points; Freestall Flush – 0
No points assigned because this is not an ammonia control.
Compliance: None

Discussion: Mr. Naerebout stated the Department must ensure the dairies know there is no credit for using this practice for purposes of this rule.

Aerated Lagoon.
Definition: Biological treatment basin designed to decompose liquid manure and nitrify ammonia in the presence of oxygen. This system has a pH of 7.0 to 8.0, and sludge is designed to be removed every 5 years. Systems should utilize submerged micro-bubble systems to reduce ammonia loss. If engineering guidelines are not specified by the designer, system should be operated to maintain a dissolved oxygen concentration greater than 1.5 mg/l and an oxygen reduction potential greater than 50. ~~Seasonal~~Quarterly monitoring of inflow and outflow nitrogen species is required to track system performance. Also effective in reducing volatile organic compounds, biological oxygen demand, and odor.

Points: Open Lot - 10 points; Freestall Scrape – 12 points; Freestall Flush – 15 points.
Point differences are based on the amount of material to be treated.

Compliance: Recordkeeping, Reporting Required - sensor for dissolved oxygen, oxygen-reduction-potential level; quarterly monitoring of the inflow/outflow

Discussion: There are a few dairies using this practice. The pH and oxygen-reduction-potential levels are vital for this practice to function effectively. "Seasonal monitoring" should be changed to "quarterly monitoring." Ms. Kelly stated this should state what the dairy needs to do to have a qualifying aerated system including information about the monitoring, such as sensor for dissolved oxygen, continuous sensor, or three-time a week monitoring. After discussion about how the lagoon system would operate and when and where monitoring should be done, the group decided the definition needs to be clarified. Mr. Sheffield suggested changing the lead-in sentence to read, "Biological treatment basin designed to decompose liquid manure and nitrify ammonia in the presence of oxygen."

Sequencing Batch Reactor.
Definition: Single tank treatment system that allows for the sequencing of anaerobic, anoxic and aerobic conditions within the tank through the scheduling of wastewater feeding and aeration. Successful systems have been documented to reduce 85% of total nitrogen for animal wastewater. ~~Seasonal~~Quarterly monitoring of inflow and outflow nitrogen species is required to track system performance. Also effective in reducing volatile organic compounds, biological oxygen demand***,*** and odor.

Points: Open Lot - 15 points; Freestall Scrape – 20 points; Freestall Flush – 20 points
More points are given than for an aerated lagoon because it is more efficient.

Compliance: Recordkeeping and reporting required. Seasonal monitoring of inflow/outflow will be needed.

Discussion: This is the same concept as the aerated lagoon but instead of consistent aerating, the dairy aerates, then allows it to settle, then pumps out water. The process encourages denitrification of not only the conversion of ammonia to nitrate but when it goes to the settling period inside the tank, conversion of nitrate to nitrogen gas occurs. Reduction of total nitrogen is 85% or more. There are no Idaho facilities using this system; some dairies and hog farms are currently using this in North Carolina, Tennessee, and Iowa. "Seasonal monitoring" should be changed to "quarterly monitoring."

Lagoon Nitrification and Denitrification System.
Definition: Engineered lagoon modification or stand-alone system designed and operated to convert wastewater ammonia to nitrate and then to nitrogen gas. ~~Seasonal~~Quarterly monitoring of inflow and outflow nitrogen species is required to track system performance. Also effective in reducing volatile organic compounds, biological oxygen demand**,** and odor.

Points: Open Lot - 15 points; Freestall Scrape – 20 points; Freestall Flush – 20 points

Compliance: Recordkeeping and reporting required. Seasonal monitoring of inflow/outflow will be needed.

Discussion: This practice is the same concept as the sequencing batch reactor except instead of using a large tank, the existing lagoon is modified. This has been used in Washington, Texas, California, Florida, and North Carolina. "Seasonal monitoring" should be revised to read "quarterly monitoring." Management of the BMP would differ among the three farm types. A flush system would start with a settling zone upfront, which would be anaerobic, and then the material would go through a baffle, and then be aerated within a short zone. Then it would go anaerobic, then be aerated again and then sent to a storage zone. This is a very effective practice. This practice would be preferential over the sequencing batch reactor.

Fixed Media Aeration System.
Definition: Stand-alone treatment system designed and operated to convert wastewater ammonia to nitrate. Systems utilize a media or substrate on which to propagate bacterial growth. Several systems have been shown to denitrify wastewater nitrate into nitrogen gas. ~~Seasonal~~Quarterly monitoring of inflow and outflow nitrogen species is required to track system, performance. Also effective in reducing volatile organic compounds, biological oxygen demand**,** and odor.

Points: Open Lot - 15 points; Freestall Scrape – 20 points; Freestall Flush – 20 points

Compliance: Recordkeeping and reporting required. Seasonal monitoring of inflow/outflow will be needed.

Discussion: This practice makes a home for the bacteria, which is the substrate. Depending on how the media is built, zones or little eddies of low flow are created which are anaerobic. These eddies move around and conversion happens. As little as two inches ahead of that you get conversion of ammonia to nitrate and then it just slows down enough to where a little pocket of anaerobic conditions happen and conversion of nitrate to nitrogen gas occurs. Or, biological growth thickens on the media to produce bacteria that converts from ammonia to nitrate on the outside and denitrification bacteria close to the substrate surface. Both reactions happen instantaneously. The entire process depends on how the system is built and managed. The ultimate goal is to put high ammonia in, so high nitrate or no or very low ammonia water comes out. It will either come out as nitrogen gas or as nitrate.

GENERAL PRACTICES

Vegetative or Wooded Buffers – Established/Establishing.
Definition: Mixture of hardwood and evergreen trees or shrubs control, capture, and mix higher elevated cleaner air with lower, dust and odor laden air from the ground surface. Also effective on odor, and dust. Should be installed between production facility/lagoon and neighbors. (Established: At mature growth stage; Establishment: Planted but not at manure growth stage.)

Points:
(Established) Open Lot - 7 points; Freestall Scrape – 7 points; Freestall Flush – 7 points
(Establishment) Open Lot – 2 points; Freestall Scrape – 2 points; Freestall Flush – 2 points

Compliance: Observation

Discussion: Data shows that trees act as an ammonia dispersant. Mr. Bauer pointed out that height and fullness of the trees are a factor. As the wind crosses the tree buffer, the very sticky ammonia clings to the trees. There was discussion about how many rows of trees are needed and what configuration is appropriate. Committee members stated that the Natural Resources Conservation Service (NRCS) standard for windbreaks is available for reference on their website. The NRCS standard was for two rows of conifers and one row of an autumn olive-type tree which is very busy and very branchy – mature height is 25-30 feet.

Alternatives to Copper Sulfate.
Definition: Use of approved alternatives to copper sulfate as a hoof treatment and preventative measure. No effect on ammonia; significant reduction in hydrogen sulfide.

Points: Open Lot - 0 points; Freestall Scrape – 0 points; Freestall Flush – 0 points

Compliance: None

Discussion: None

New BMPs to Add to Table
The following BMPs were discussed and should be added to the BMP list:

- In-House Separation (for discussion, see Separate Slurry & Liquid Manure Basins)
- Summertime Deep Bedding (for discussion, see Separate Slurry & Liquid Manure Basins)
- Direct Utilization of Flush Water (for discussion, see Direct Utilization Collected Parlor Wastewater)

SCHEDULE AND AGENDA FOR FUTURE MEETINGS
The next negotiated rulemaking meeting is scheduled for October 4, 2005, 9:00-noon at the DEQ offices in Boise. The agenda will include the following topics:

- Continue Discussion of BMP Definitions and Compliance Options
- ISDA Process for Conducting Milk Inspections (Marv Patten)

(Editor's Note: The October 4 meeting was cancelled due to a scheduling conflict; next meeting date is pending.)